

IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: HAYDEL PROPERTIES, L.P.

CHAPTER 11  
CASE NO. 12-50048-KMS

BANCORPSOUTH BANK'S OBJECTION TO  
CONFIRMATION OF PLAN OF REORGANIZATION

COMES NOW BancorpSouth Bank, and files this its Objection to Debtor's Amended Plan of Reorganization [Dkt. #385], and in opposition to said Plan, shows unto the Court that:

(1) the Plan does not treat the Bank fairly and equitably as required by 11 U.S.C. § 1129(b)(2).; and (2) Debtors have failed to provide supplemental information as mandated by this Court in its Order Approving Disclosure Statement [Dkt #433] entered June 7, 2013; the Plan is incapable of being confirmed due to Debtor's default as it is too vague and speculative; (3) the Plan imposes undue burdens upon the Bank in the event of default; and (4) other infirmities which will be demonstrated at the Hearing.

WHEREFORE, premises considered, BancorpSouth Bank objects to confirmation of the Debtor's Amended Plan of Reorganization.

Respectfully submitted, this the 18th day of July, 2013.

BANCORPSOUTH BANK

BY: PAGE, MANNINO, PERESICH,  
& McDERMOTT, P.L.L.C.

BY: /s/ Les W. Smith  
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CERTIFICATE

I, LES W. SMITH, of the law firm of Page, Mannino, Peresich & McDermott, P.L.L.C., do hereby certify that the following have been served electronically via ECF with a copy of the above BANCORPSOUTH BANK'S OBJECTION TO CONFIRMATION OF PLAN OF REORGANIZATION to the following:

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So certified, this the 18<sup>th</sup> day of July, 2013.

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